

**AFFIDAVIT IN SUPPORT OF APPLICATIONS
FOR SEARCH AND SEIZURE WARRANTS**

I, Eli D. Bupp, being duly sworn, state and depose and say that:

1. I am a Special Agent with Homeland Security Investigations (HSI), Department of Homeland Security since June 7, 2009. From August 4, 2003 until June 6, 2009, I was an Officer with the United States Secret Service Uniformed Division, Department of Homeland Security. My past and current duties include, but are not limited to, the investigation and enforcement of the Immigration and Nationality Act, relating to identity and immigration benefit fraud. As a member of the Document and Benefit Fraud Task Force (DBFTF), I have been involved in investigations relating to 18 U.S.C. §1546 (visa fraud), 18 U.S.C. §1425 (naturalization fraud), 18 U.S.C. §1001 (false statements), 8 U.S.C. §1325(c) (marriage fraud), and 18 U.S.C. §371 (conspiracy to commit offense or to defraud United States) since June 11, 2010. The information detailed herein is known by me or has been provided to me by other law enforcement officers.
2. For the reasons set forth in this affidavit, there is probable cause to believe that the fruits and evidence related to violations of 18 U.S.C. §1546, 18 U.S.C. §1425, 18 U.S.C. §1001, 8 U.S.C. §1325(c), and 18 U.S.C. §371, as more fully set out in **Attachment B** hereto, will be found at the following locations:
 - a. **1907 Mount Hope Court, Hanover, MD 21076** (residence of Hakan MERAL) (more fully described in **Attachment A-1**);
 - b. **7897 Pavilion Drive, Severn, MD 21144** (residence of Fatih SONMEZ) (more fully described in **Attachment A-2**);
 - c. **1664 Carlyle Drive, Apartment H, Crofton, MD 21114**, (residence of Meltem MERAL and Murat AKSU) (more fully described in **Attachment A-3**); and
 - d. **513 46th Street, Baltimore, MD 21224**, (residence of Tina ECKLOFF) (more fully described in **Attachment A-4**).



STATUTES

3. Title 18, United States Code, §371 renders it unlawful for two or more persons to conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy.
4. Title 8, United States Code, §1325(c) renders it unlawful for a person to knowingly enter into a marriage for the purpose of evading any provision of the immigration laws.
5. Title 18, United States Code, §1546 renders it unlawful for a person to knowingly forge, counterfeit, alter or falsely make any immigrant or nonimmigrant visa, permit, border crossing card, alien registration receipt card or other documents prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States.
6. Title 18, United States Code, §1001, renders it unlawful for a person to knowingly and willfully falsify, conceal, or cover up by any trick, scheme, or device a material fact; make any materially false, fictitious, or fraudulent statement or representation; or make or use any false writing or document knowing the same to contain any material false, fictitious, or fraudulent or statement or entry.
7. Title 18, United States Code, §1425 renders it unlawful for a person to knowingly procure or attempt to procure, contrary to law, the naturalization of any person, whether for himself or another person not entitled thereto.

SUMMARY OF INVESTIGATION

8. Department of Homeland Security (hereinafter, "DHS"), U.S. Citizenship and Immigration Services (hereinafter, "USCIS") Form I-130, Petition for Alien Relative, is a form

typically submitted by a United States citizen on behalf of a non-citizen relative in support of the non-citizen's application for United States immigration benefits.

9. DHS USCIS Form I-751, Petition to Remove Conditions on Residence, is a form typically submitted by an alien, that is, someone who is not a United States citizen, who has certain immigration benefits at the time the form is submitted, in an effort to change or eliminate conditions on the applicant's residency status in the United States.

10. DHS USCIS Form N-400, Application for Naturalization, is a form typically submitted by an alien applying to become a United States citizen.

11. DHS USCIS Form I-485, Application to Register Permanent Residence or Adjust Status, is a form typically submitted by an alien seeking a change in his or her immigration status.

12. DHS USCIS Form I-360, Petition for Amerasian, Widow(er), or Special Immigrant, is a form typically submitted by an alien seeking a change in his or her immigration classification, including a "Self-Petitioning Spouse of Abusive U.S. Citizen or Lawful Permanent Resident."

13. DHS USCIS Form N-445, Notice of Naturalization Oath Ceremony, is a form sent by USCIS to an applicant for naturalization notifying said alien to appear for a Naturalization Oath Ceremony at a designated time and location, and it includes a list of questions pertaining to citizenship eligibility the alien has to answer before being naturalized.

14. Meltem MERAL was born in Turkey in 1979, and is a citizen of that country. As of the date of this affidavit, she is a conditional lawful permanent resident of the United States based on her marriage to a United States citizen.

15. Murat AKSU, was born in Turkey in 1975. He entered the United States in or about March 2003, and is, as of the date of this affidavit, a naturalized United States citizen based on

his marriage to a United States citizen.

16. S.M. was born in Baltimore, Maryland, in 1986, and is a citizen of the United States.
aka. Stacy Martin, say eh
17. J.A. was born in Oklahoma City, Oklahoma, in 1987, and is a citizen of the United States.
aka. Jeremy AUBIN, say eh
18. Tina ECKLOFF was born in Baltimore, Maryland, in 1987, and is a citizen of the United States.
19. Fatih SONMEZ, was born in Turkey in 1983, and is a citizen of that country. He entered the United States in or about 1999, and as of the date of this affidavit, he is a B-2 visa overstay.
20. Zafer BOZKURT, was born in Turkey in 1978, and is a citizen of that country. He entered the United States in or about 2001. He married T.A., a United States citizen on or about August 5, 2004, and is, as of the date of this affidavit, a lawful permanent resident of the United States based on his marriage to a United States citizen. He is a friend of Fatih SONMEZ.
21. T.A. was born in Washington, DC, in 1983, and is a citizen of the United States. She was
aka. Tina ALBRECHT, eh say
a friend of Tina ECKLOFF.
22. Hakan MERAL, the brother of Meltem MERAL, was born in Turkey in 1974. He entered the United States in or about July 1997, and is, as of the date of this affidavit, a naturalized United States citizen based on his marriage to a naturalized United States citizen.
23. On or about August 17, 2004, Meltem MERAL married Murat AKSU, which marriage ended by annulment on or about December 2, 2004.
24. On or about November 18, 2005, in the District of Maryland, Murat AKSU married S.M.
25. On or about January 9, 2006, Hakan MERAL filed an affidavit with USCIS claiming to the legitimacy of the marriage between Murat AKSU and S.M.
26. On or about February 6, 2006, in the District of Maryland, S.M. submitted a Form I-130

on behalf of Murat AKSU.

27. On or about February 6, 2006, in the District of Maryland, Murat AKSU submitted a Form I-485.

28. On or about December 29, 2006, female K.M. was born to Meltem MERAL and an unidentified father.

29. On or about July 9, 2008, in the District of Maryland, Meltem MERAL married J.A.

30. On or about July 27, 2008, in the District of Maryland, Meltem MERAL submitted a Form I-485.

31. On or about July 27, 2008, in the District of Maryland, J.A. submitted a Form I-130 on behalf of Meltem MERAL.

32. On or about November 18, 2008, in the District of Maryland, Fatih SONMEZ married Tina ECKLOFF.

33. On or about January 2, 2009, in the District of Maryland, Fatih SONMEZ submitted a Form I-485.

34. On or about January 2, 2009, in the District of Maryland, Tina ECKLOFF submitted a Form I-130 on behalf of Fatih SONMEZ.

35. On or about June 22, 2009, in the District of Maryland, Tina ECKLOFF and Fatih SONMEZ were interviewed twice by USCIS regarding their pending applications to acquire immigration benefits based on the legitimacy of their marriage. The interviewing officers noted several indications that the marriage was a fraudulent marriage, entered into for the sole purpose of procuring immigration benefits.

36. On or about June 4, 2010, in the District of Maryland, Tina ECKLOFF was mailed a

notice of intent to deny her Form I-130, based on the numerous discrepancies during their interviews on June 22, 2009.

37. On or about August 16, 2010, in the District of Maryland, T.A. was interviewed by HSI regarding the legitimacy of her marriage to Zafer BOZKURT. T.A. admitted she entered into a fraudulent marriage with Zafer BOZKURT for the sole purpose of evading immigration laws. Zafer BOZKURT and Alper BOZKURT asked T.A. if she had any friends who would also enter into a fraudulent marriage with one of their friends. T.A. introduced Tina ECKLOFF to Zafer BOZKURT and Alper BOZKURT.

38. On or about September 30, 2010, in the District of Maryland, Murat AKSU submitted a Form N-400.

39. On or about October 20, 2010, Hakan MERAL filed an affidavit with USCIS claiming to the legitimacy of the marriage between Meltem MERAL and J.A. Hakan MERAL claimed Meltem MERAL and J.A. lived together in the basement of his home, at 1907 Mount Hope Court, Hanover, MD 21076.

40. On or about November 03, 2010, in the District of Maryland, Meltem MERAL submitted a Form I-751.

41. On or about February 10, 2011, in the District of Maryland, Tina ECKLOFF was interviewed by HSI personnel regarding the legitimacy of her marriage to Fatih SONMEZ. Tina ECKLOFF was interviewed at approximately 6:15 a.m. at 1423 Harford Square Drive, Edgewood, MD 21040, the residence of her mother. It appeared to the interviewing agents that Tina ECKLOFF was living at this address, and not 90 Mary Lane Apt. 301, Glen Burnie, MD 21061, the residence of Fatih SONMEZ.

42. On or about February 15, 2011, in the District of Maryland, Murat AKSU received and submitted a Form N-445, and became a naturalized United States citizen.

43. On or about March 1, 2011, HSI Special Agent Bupp observed Meltem MERAL driving a vehicle registered to Murat AKSU, and arriving at Murat AKSU'S listed residence.

44. On or about April 14, 2011, J.A. signed a sworn statement admitting his marriage to Meltem MERAL was fraudulent. Murat AKSU, a co-worker of J.A. at the time of his arranged marriage, approached J.A. and asked if he would marry his wife, Meltem MERAL. Murat AKSU explained that Meltem MERAL's visa had expired and she was going to be deported from the United States. Murat AKSU told J.A. that he too was in a fraudulent marriage and everything would be okay. J.A. never lived with Meltem MERAL, Murat AKSU, or Hakan MERAL. J.A. stated Murat AKSU is the father of K.M.

45. On or about July 15, 2011, in the District of Maryland, Hakan MERAL submitted an affidavit to USCIS claiming the marriage between Tina ECKLOFF and Fatih SONMEZ was a legitimate marriage, but they ultimately separated due to Tina ECKLOFF'S changed and violent behaviors.

46. On or about February 17, 2012, Murat AKSU filed for divorce. On his divorce document, he claims that on or about February 16, 2011, he and S.M. legally separated as husband and wife.

47. On or about December 6, 2012, HSI observed Hakan MERAL departing **1907 Mount Hope Court, Hanover, MD 21076** at approximately 7:45 a.m.

48. As of the date of this affidavit, Hakan MERAL is the listed owner of **1907 Mount Hope Court, Hanover, MD 21076** according to Maryland Real Property Data Search.

49. On or about December 6, 2012, Fatih SONMEZ was observed by HSI departing **7897 Pavilion Drive, Severn, MD 21144** at approximately 10:00 a.m.

50. On or about January 4, 2013, Fatih SONMEZ has a vehicle registered to, and a driver's license listed at the address of **7897 Pavilion Drive, Severn, MD 21144**. *myth.*

51. On or about December 5, 2012, HSI Special Agent Tyler observed Murat AKSU, Meltem MERAL, and K.M. departing **1664 Carlyle Drive, Apartment H, Crofton, MD 21114**. *In late 2012, Meltem MERAL signed a twelve month lease renting an apartment at 1664 Carlyle Drive, Apartment H, Crofton, MD 21114.*

52. On or about November 7, 2012, Tina ECKLOFF was observed by HSI arriving to **513**

CP **513 46th Street, Baltimore, MD 21224** at approximately 4:00 p.m. following a court appearance. As *Murat AKSU and Meltem MERAL have been observed several times departing 1664 Carlyle Drive, Apt. H, Crofton, MD 21114 at approximately 9:00 a.m.*

of the date of this affidavit, Tina ECKLOFF'S listed address on Maryland Judiciary Case Search, for District Court for Anne Arundel County – Criminal System, case number 6A00234191, is **513 46th Street, Baltimore, MD 21224**.

53. On or about December 3, 2012, Tina ECKLOFF was observed by HSI departing **513 46th Street, Baltimore, MD 21224** at approximately 9:00 a.m.

PROBABLE CAUSE

54. On December 20, 2012, the Grand Jury for the District of Maryland, returned an indictment in which Fatih SONMEZ, Tina ECKLOFF, Zafer BOZKURT, and Hakan MERAL, were charged with marriage fraud, in violation of 8 U.S.C. § 1325(c), and aiding and abetting in violation of 18 U.S.C. § 2. The Indictment and Arrest Warrants obtained the same day remain UNDER SEAL until the anticipated arrest of these defendants on January 10, 2013.

55. On December 20, 2012, the Grand Jury for the District of Maryland, returned an indictment in which Meltem MERAL, Murat AKSU, and Hakan MERAL were charged with marriage fraud, in violation of 8 U.S.C. § 1325(c), and aiding and abetting in violation of 18

U.S.C. § 2, and Murat AKSU was charged with Naturalization Fraud, in violation of 18 U.S.C. § 1425(a). The Indictment and Arrest Warrants obtained the same day remain UNDER SEAL until the anticipated arrest of these defendants on January 10, 2013.

56. Based on knowledge and experience, the following is commonly known to occur as it relates to persons involved in marriage fraud:

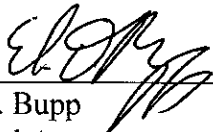
a. It is common for marriage fraud subjects to enter marriages for the purpose of evading immigration laws. The alien and United States citizen stay married long enough until the alien receives some type of benefit from USCIS. After an alien obtains an immigration benefit from USCIS, typically the alien and United States citizen end their marriage through divorce or separation.

b. Individuals involved in marriage fraud commonly and ordinarily keep documents or indicia that are evidence of their fraudulent marriage. Individuals keep documents that have previously been filed with USCIS.

c. Individuals involved in marriage fraud commonly and ordinarily keep documents or indicia that are evidence of their actual relationship they were involved in during the time they were in a fraudulent marriage.

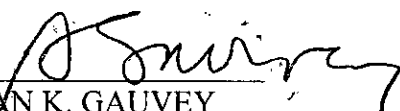
57. Based on the foregoing facts, your affiant believes there is probable cause to believe that 18 U.S.C. §1546, 18 U.S.C. §1425, 18 U.S.C. §1001, 8 U.S.C. §1325(c), and 18 U.S.C. §371 have been violated, and that at the residences, evidence, fruits, and instrumentalities of these offenses listed in Attachment B, which is incorporated herein by reference, are located at the residences described more fully in Attachments A-1, A-2, A-3, and A-4, which are incorporated herein by reference. Your Affiant respectfully requests that this court issue search warrants for

the residences more particularly described in said attachments, authorizing the seizure of the items described in Attachment B.



Eli D. Bupp
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me, this 9 day of January 2013.



SUSAN K. GAUVEY
United States Magistrate Judge

Attachment A-1

Description of Residence



1907 Mount Hope Court, Hanover, MD 21076 is located within the Hanover city limits, within Anne Arundel County. This address is described as a two story house with off-white siding on the front, sides, and back of the house. The first floor, facing the front of the house, has a brown and white door, on the left side of the house, and two off-white garage doors on the right side of the house. On the left garage door, at the top of the door, house number "1907" is posted in black numbers.

The second level, facing the front of the house, has a few windows that overlook the front of the residence. The gray shingle roof slopes in multiple directions.

for

Attachment A-2

Description of Residence



7897 Pavilion Drive, Severn, MD 21144 is located within the Severn city limits, within Anne Arundel County. This address is described as a two story house with white siding on the front, sides, and back of the house. The first floor, facing the front of the house, has a white door, directly in the center of the house, and two off-white garage doors on the right side of the house. On the mailbox in front of the house, house number "7897" is posted in black numbers.

The second level, facing the front of the house, has three windows that overlook the front of the residence. The black shingle roof slopes toward the front and back of the residence.

mc

Attachment A-3

Description of Residence



1664 Carlyle Drive, Apartment H, Crofton, MD 21114 is located within the Crofton city limits, within Anne Arundel County. This address is described as a two story brick apartment building with yellow siding around several windows. The entrance to the building is an opening in the middle of the building, with steps leading to the sidewalk. The opening in the center of the building leads to a courtyard, where a staircase leads to an apartment with the letter "H" posted beside the door.

The second level, facing the front of the building, has three sets of windows that overlook a parking lot beside the building. The black shingle roof slopes toward the front and back of the residence.

MC

Attachment A-4

Description of Residence



513 46th Street, Baltimore, MD 21224 is located within the Baltimore county limits, within Baltimore County. This address is described as a two story brick house with a front porch located on the left side of the front of the house. The first floor, facing the front of the house, has a white door, directly in the center of the house. Beside the white door, house number "513" is posted.

The second level, facing the front of the building, has a window on the right side that overlooks the front of the residence. The gray shingle roof slopes in multiple directions.

me

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Attachment B
Items to be Seized from the Residences

1907 Mount Hope Court, Hanover, MD 21076 (Attachment A-1)
7897 Pavilion Drive, Severn, MD 21144 (Attachment A-2)
1664 Carlyle Drive, Apt. H, Crofton, MD 21114 (Attachment A-3)
513 46th Street, Baltimore, MD 21224 (Attachment A-4)

Any and all records and documents relating to Hakan MERAL, Murat AKSU, S.M. J.A., Meltem MERAL, Fatih SONMEZ, Tina ECKLOFF, Zafer BOZKURT, and T.A, **which pertain to or reflect on their marital status and/or the acquisition of immigration benefits**, including but not limited to:

1. ~~Any personal or business bank account records, to include monthly statements, cancelled checks, debit and credit memoranda, deposit slips, wire transfer records and any correspondence.~~ *EB, sm*

2. ~~Accounts Receivable and Payable Journals and Ledgers.~~ *EB, sm*

3. Correspondence from the Department of Labor, the Immigration and Naturalization Service, the Department of Homeland Security, the Department of State and any state employment commission. *EB,*

4. Telephone toll call and facsimile machine transmission records. *between any of the ^{one} above mentioned individuals.*

5. Desk calendars and appointment books. *that relate to communication and/or meetings between the above mentioned individuals.*

6. Copies of federal and state tax returns of to Hakan MERAL, Murat AKSU, S.M., *Stacy MARTIN* J.A., Meltem MERAL, Fatih SONMEZ, Tina ECKLOFF, and T.A. *Jeremy AUBIN*

7. Records of all vehicles titled to to Hakan MERAL, Murat AKSU, S.M. J.A., *Tina ALBRECHT* Meltem MERAL, Fatih SONMEZ, Tina ECKLOFF, Zafer BOZKURT, and T.A. *Stacy MARTIN* *Jeremy AUBIN* *Tina ALBRECHT* *EB,*

8. Any and all information pertaining to labor certification applications, visa applications, passport applications, and/or visa petitions that is stored electronically on the computer or computer media, including but not limited to facsimile machines, hard disk drives, tape storage, floppy diskettes, and removable hard diskettes, laser disks, zip drives including the hardware and software necessary to access such information. *sm*

9. ~~Any and all documents, correspondence, notes, statements, receipts or other records that reference or indicate the fraudulent activity.~~ *EB, sm*

10. All banking documents/statements, bank account numbers, credit cards, credit card account numbers, credit card statements; ATM access cards, ATM access card statements, checks books, receipts, or notes, correspondence or records that refer to any financial accounts or financial transactions. *that demonstrate relationships between the above mentioned individuals and that show relationships between the above mentioned individuals and other individuals not listed.* *EB,* *sm*

